

Case No. IPR2023-00996  
Patent 10, 991,165

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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SONY INTERACTIVE ENTERTAINMENT, LLC,

Petitioner,

v.

QUANTUM IMAGING, LLC,

Patent Owner.

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Case IPR2023-00996

Patent 10,991,165

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**DECLARATION OF MARC A. BROCKHAUS IN SUPPORT OF PATENT  
OWNER'S QUANTUM IMAGING, LLC'S RESPONSE FOR *INTER*  
*PARTES* REVIEW OF UNITED STATES PATENT NO. 10,991,165**

I, Marc A. Brockhaus, declare as follows:

1. I am a Director at the law firm of Dunlap Coddling, PC. I am registered to practice before the U.S. Patent and Trademark Office. And I am co-counsel for Patent Owner Quantum Imaging, LLC in connection with the above-captioned *inter partes* review proceeding involving U.S. Patent No. 10,991,165.

2. I have personal knowledge of the matters set forth in this declaration. If called as a witness, I am competent to testify to these matters.

3. Attached as Exhibit 2006 is a true and correct copy of Software Architecture in Industrial Applications,” Soni et al., International Conference on Computer Engineering 1995, Seattle, Washington, USA, published by the Association for Computing Machinery.

4. Attached as Exhibit 2007 is a true and correct copy of excerpts from Merriam-Webster’s Collegiate Dictionary, 10th Edition, Merriam-Webster Incorporated, United States, 2001.

5. Attached as Exhibit 2008 is a true and correct copy of excerpts from Microsoft Computer Dictionary, copyright 2002, 5th edition, Microsoft Press, a Division of Microsoft Corporation, One Microsoft Way, Redmond Washington 98052-6399.

6. Attached as Exhibit 2011 is a true and correct copy of a deposition transcript of David Crane dated February 26, 2024.

7. Attached as Exhibit 2011a is a true and correct copy of Volume 2 of the deposition transcript of David Crane dated February 29, 2024.

8. Attached as Exhibit 2012 is a true and correct copy of a deposition transcript of Alexander Harry dated February 27, 2024.

9. Attached as Exhibit 2013 is a true and correct copy of the webpage <https://www.mobymgames.com/game/3341/microsoft-flight-simulator-2000/screenshots/windows/351054/>.

10. Attached as Exhibit 2014 is a true and correct copy of the Claim Construction Order dated 10/20/2023, from *Quantum Imaging LLC v. Sony Group Corporation et al.*, No. 1:23-cv-01212-ADA-DTG (W.D. Tex.), Document 159.

11. I hereby declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true. I further declare that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under section 1001 of Title 18 of the United States Code and that such willful statements may jeopardize the validity of the application or any patents issued thereon.

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Date: March 18, 2024

Respectfully submitted,

/Marc A. Brockhaus/

Marc A. Brockhaus

USPTO Reg. No. 40,923

Dunlap Coddling, P.C.